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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs

TYRONE PAUL PONTHEUX,

Defendant.

No. 2:15-mj-00522-NJK

COMPLAINT

18 U.S.C. § 871(a): Threats against the
President of the United States;
21 U.S.C. § 841(a)(1): Possession of a
Controlled Substance with Intent to
Distribute – Marijuana;
18 U.S.C. § 924(c): Possession of a
Firearm in Furtherance of a Drug
Trafficking Crime

BEFORE the United States Magistrate Judge, Las Vegas, Nevada, the undersigned
complainant, being duly sworn, deposes and states:

COUNT 1

Threats against the President of the United States

On or about November 2, 2014, in the State and Federal District of Nevada, TYRONE
PAUL PONTHEUX, the defendant, did knowingly and willfully make a threat to take the life of,
to kidnap, and to inflict bodily harm upon the President of the United States, specifically, defendant
posted the following to his Facebook page: "I think we all need to get our guns and shoot all of
these out of control congressmen and senators and Obama! Any survivors, hang them, then try
their dead bodies for High treason! Then after they hang in the streets for a week, run over them
then to the tree chipper to finish the job and use them for fertilizer for all of Monsanto's GMO
bullshit, then feed it to the Monsanto fucktards and do the process over and over and over again

1 until they all get fucking regurgitated by this fucktard earth of ours! FUCK EVERYONE WHO
 2 SITS ON THEIR FUCKING ASSES AND DO NOTHING ABOUT OUR PRESENT
 3 SITUATION! FUCK AMERICA IN THE ASS!" in violation of Title 18, United States Code,
 4 Section 871(a).

5 COUNT 2

6 **Possession of a Controlled Substance with Intent to Distribute – Marijuana**

7 On or about May 21, 2015, in the State and Federal District of Nevada, TYRONE
 8 PAUL PONTHEUX, the defendant, did knowingly and intentionally possess with the intent to
 9 distribute approximately 362.8 grams of a mixture and substance containing a detectable amount of
 10 marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section
 11 841(a).

12 COUNT 3

13 **Possession of a Firearm in Furtherance of a Drug Trafficking Crime**

14 On or about May 21, 2015, in the State and Federal District of Nevada, TYRONE
 15 PAUL PONTHEUX, the defendant, knowingly possessed a firearm in furtherance of a drug
 16 trafficking crime, to wit: Possession of a Controlled Substance with Intent to Distribute –
 17 Marijuana, in violation of Title 21, United States Code, Section 841 (a)(1), all in violation of Title
 18 18, United States Coode, Section 924(c).

19 Complainant, Matthew James Schaeffer, as a Special Agent with the Federal Bureau
 20 of Investigation (FBI), states the following as and for probable cause:

21 1. I am an "investigative or law enforcement officer of the United States" within
 22 the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States
 23 who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated
 24 in Title 18, United States Code, Section 2516. I have been employed by the FBI as a Special Agent
 since July, 2009. I am currently assigned to the Las Vegas, Nevada (NV), Field Office. Prior to my

1 employment with the FBI, I was employed as a police officer for the York City Police Department in
2 York, PA. In connection with my FBI duties, I investigate criminal violations of the Controlled
3 Substances Act. Through the FBI, I have received specialized training in the enforcement of federal
4 narcotics laws. My training and experience has involved, among other things: (1) the debriefing of
5 defendants, witnesses and informants, as well as others who have knowledge of the distribution and
6 transportation of controlled substances and of the laundering and concealment of proceeds of drug
7 trafficking; (2) surveillance; (3) analysis of documentary and physical evidence; (4) the hand-to-
8 hand purchase of controlled substances; and (5) the execution of search warrants.

9 2. The following information contained within this criminal complaint is based
10 upon my own participation in this investigation or was provided to me by other law enforcement
11 personnel. All times are approximate.

12 3. During the course of conducting open source Internet searches related to
13 another investigation, FBI personnel discovered a Facebook page attributed to TYRONE PAUL
14 PONTHEUX, SR. (www.facebook.com/cyclonesky?fref=ufi). Located on the page is a default
15 picture of a white adult male holding an AR-15 rifle while sitting on a black Hummer H-1. The
16 male was confirmed to be PONTHEUX through his Nevada driver's license photo.

17 4. An open source check of PONTHEUX's Facebook page revealed a
18 November 2, 2014 posting of the following threat: "I think we all need to get our guns and shoot
19 all of these out of control congressmen and senators and Obama! Any survivors, hang them, then
20 try their dead bodies for High treason! Then after they hang in the streets for a week, run over
21 them then to the tree chipper to finish the job and use them for fertilizer for all of Monsanto's GMO
22 bullshit, then feed it to the Monsanto fucktards and do the process over and over and over again
23 until they all get fucking regurgitated by this fucktard earth of ours! FUCK EVERYONE WHO
24

1 SITS ON THEIR FUCKING ASSES AND DO NOTHING ABOUT OUR PRESENT
2 SITUATION! FUCK AMERICA IN THE ASS!”

3 5. On April 27, 2015, the Las Vegas Metropolitan Police Department received a
4 tip from a concerned citizen that he overheard a telephone conversation between his neighbor,
5 TYRONE PONTHEUX, who resides at 6224 Miraloma Street, Las Vegas, NV 89108, and an
6 unknown individual. During the conversation, PONTHEUX inquired about obtaining a quantity
7 of Ammonium Nitrate. Ammonium Nitrate is a chemical compound that is commonly used in
8 fertilizers and other household products, but can also be used to make explosives when mixed with
9 other chemicals. During the telephone call, PONTHEUX also made a statement that he may be
10 killed, but not before he takes out a few of them first.

11 6. On May 21, 2015, PONTHEUX was interviewed at his residence, 6224
12 Miraloma Street, by members of the FBI Las Vegas Joint Terrorism Task Force. PONTHEUX is
13 the boyfriend of KAREN SELOVER and currently resides with her at 6224 Miraloma Street.
14 PONTHEUX has lived at 6224 Miraloma Street for approximately five years. SELOVER is the
15 property owner.

16 7. During the interview, PONTHEUX admitted to posting several death threats
17 toward US senators, US congress members, and President Obama via his Facebook account over
18 the past few months. PONTHEUX said he made the threats because he was very angry and
19 frustrated with the United States government. PONTHEUX said that he believes the US
20 government no longer supports the American people and feels that it is President Obama's fault.

21 8. When shown a copy of the November 2, 2014 death threat posted on his
22 Facebook page, PONTHEUX admitted that he wrote and posted the threat to his Facebook
23 account.
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1 9. PONTHIEUX told agents that he owns several firearms, including an AR-15
2 rifle, a shotgun, several .22 caliber rifles, and two pistols, but said he did not have any explosives
3 in his possession. PONTHIEUX also told agents that he used methamphetamine approximately
4 once a week and that there was a bag of marijuana in the residence.

5 10. Agents obtained verbal and written consent from PONTHIEUX and
6 SELOVER to conduct a search of their residence for marijuana, explosives, explosive pre-cursors,
7 and illegal firearms. During the search, a bag of suspected marijuana was seized from the
8 residence. No explosives or explosive pre-cursors were found in the residence. Five rifles and
9 two pistols were found in the residence, all registered to PONTHIEUX. One firearm, a Sears and
10 Roebuck .22 caliber rifle, was seized by the Las Vegas Metro Police Department (LVMPD)
11 pending a stolen firearm investigation.

12 11. The bag of suspected marijuana field tested positive for marijuana and
13 weighed 362.8 grams.

14 12. After agents seized the bag of marijuana, PONTHIEUX asked them to leave
15 some behind for him. When agents advised PONTHIEUX that they would not comply with his
16 request, PONTHIEUX said, "There's plenty more where that came from."

17 13. Records checks revealed that PONTHIEUX was arrested and charged by the
18 Las Vegas Metro Police Department in 2011 for Possession of Marijuana, in 2008 for Non-
19 Sufficient Funds/Checks, and in 2007 for Uttering Forged Instruments, Burglary and Theft.

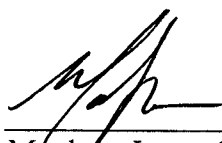
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1 14. Based on my training and experience, I believe that there is probable cause to
2 believe that TYRONE PAUL PONTHEUX violated Title 18, United States Code, Section 871(a)
3 – Threats against the President of the United States; Title 21, United States Code, Section
4 841(a)(1), Possession of a Controlled Substance with Intent to Distribute – Marijuana; and Title
5 18, United States Code, Section 924(c), Possession of a Firearm in Furtherance of a Drug
6 Trafficking Crime.

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9 Matthew James Schaeffer, Special Agent
10 Federal Bureau of Investigation

11 SUBSCRIBED and SWORN to before me

12 This 22nd day of June, 2015.

13 
14 HONORABLE NANCY J. KOPPE
15 UNITED STATES MAGISTRATE JUDGE
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